

Statement of Basis
Georgia-Pacific Consumer Operations LLC- Naheola Mill
Facility No. 101-0001
Significant Title V Mod

Introduction

The Department received an application on October 15, 2019, from Georgia-Pacific Consumer Operations LLC- Naheola Mill for a proposal to modify their Title V Operating Permit to include the recent changes to 40 CFR Part 63, Subpart MM, National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills. The facility submitted additional information on March 31, 2020 and August 12, 2020. The Mill's current Title V Permit was issued on July 1, 2018, and expires on June 30, 2023. The EPA published Subpart MM amendments on October 11, 2017, with a compliance date of October 11, 2019.

The following units at the Naheola Mill are subject to Subpart MM requirements:

- No. 4 Recovery Furnace (Emission Unit 006)
- No. 4 Smelt Dissolving Tank (Emission Unit 007)
- No. 3 Lime Kiln (Emission Unit 008)

The Naheola Mill is requesting to remove the following retired emission units:

- No. 1 Combination Fuel Boiler (Emission Unit 001)
- No. 2 Combination Fuel Boiler (Emission Unit 002)
- Coal Preparation Plant (Emission Unit 005)

The Naheola Mill is requesting to incorporate the following Air Permits:

- Air Permit 101-0001-X041 for the No. 11 Power Boiler. Permit issued on March 24, 2017 and Authorization to Operate issued on May 5, 2019
- Air Permit 101-0001-X039 for the Bubbling Bed 01 Boiler (previous description No. 3 Combination Boiler). Permit issued on May 17, 2017 and Authorization to Operate issued on October 22, 2020

The Mill has proposed the following revisions and conditions in order to incorporate the amendments to Subpart MM:

No. 3 Lime Kiln

- Add parametric monitoring requirements found in 63.864 (e)
- Add a proviso to maintain proper operation of the electrostatic precipitator (ESP) automatic voltage control (AVC)
- Reduce the frequency for submitting excess emissions reports from quarterly to semiannually
- Add electronic reporting requirements for excess emissions reports and performance tests through EPA's Compliance and Emissions Data Reporting Interface (CEDRI)

No. 4 Recovery Furnace

- Reduce the opacity excess emissions allowance from 6 percent to 2 percent
- Adjust the requirement to maintain records detailing when corrective action is required and when a violation is noted to only apply while black liquor is being fired
- Add a proviso to maintain proper operation of the electrostatic precipitator (ESP) automatic voltage control (AVC)
- Reduce the frequency for submitting excess emissions reports from quarterly to semiannually
- Add electronic reporting requirements for excess emissions reports and performance tests through EPA's Compliance and Emissions Data Reporting Interface (CEDRI)

No. 4 Smelt Dissolving Tank

- For parametric monitoring, limit the times corrective actions are taken or violations are recorded to times when spent pulping liquor is fed
- Add the requirement to maintain records detailing when corrective action is required and when a violation is noted for flow rate or fan amperage values while black liquor is being fired, as required by 63.866(b) and (c).
- Reduce the frequency for submitting excess emissions reports from quarterly to semiannually
- Add electronic reporting requirements for excess emissions reports and performance tests through EPA's Compliance and Emissions Data Reporting Interface (CEDRI)

Admin Modifications

The Mill is also proposing several other technical corrections as administrative modifications to their Title V permit. These corrections are listed below:

No. 4 Recovery Furnace

- Revise Emission Standards Proviso 3 to include a NOX limit for periods when oil/gas is simultaneously combusted with a byproduct (black liquor or soap) as required by 40 CFR 60.44b(e).
- Add a statement clarifying that TRS, CO, and VOC emission limits apply only when black liquor solids are being fired.
- Add reporting requirements contained in 40 CFR 60 Subparts BB and Db.

No. 3 Lime Kiln

- Add a statement clarifying that TRS emission limit apply only when lime mud is being fired.
- Add 40 CFR 60 Subpart BB reporting requirements found in 60.284(d)(2)
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Chemi-Washer

- Remove phrase "and oxygen" from Emission Monitoring Proviso 1.
- Add 40 CFR 60 Subpart BB reporting requirements found in 60.284(d)(3)

C-Multiple Effect Evaporator Set, and Nos. 7 and 8 Batch Digesters

- Add 40 CFR 60 Subpart BB reporting requirements found in 60.284(d)(3)

No. 3 Power Boiler

- Change Emission Standards Proviso 3 and Compliance and Performance Test Methods and Procedures Proviso 2. The unit only fires natural gas.
- Remove Recordkeeping and Reporting Requirements Provisos 1-3. The Combination Boilers have been permanently shut down and the No. 3 Power Boiler only fires natural gas.

Sources Subject Only to the General Provisos

- Remove the following sources from the list
 - NBT Scrubber Vent
 - CV 050 Magnum Scrubber Vent
 - CV 060 Magnum Scrubber Vent
 - CV 100 Magnum Scrubber Vent
- Add the following sources to the list
 - PCMC Forte Line No. 1
 - PCMC Forte Line No. 2
 - PCMC Forte Line No. 3
 - PCMC Forte Line No. 4
 - PCMC Forte Line No. 5

Title V Modification

The proposed changes should be classified as a significant modification to the Title V Operating Permit. A 30 day public comment period and a 45 day EPA comment period would be required. The modifications would be incorporated into the Title V permit upon completion of the EPA review.

Recommendations

I recommend that Georgia-Pacific Consumer Operations LLC- Naheola Mill's Title V permit be modified as attached.



Holly T. Yeargan
Industrial Chemicals Section
Chemical Branch

November 17, 2020

Date